

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

JOHNNY M. HUNT,

Plaintiff,

v.

SOUTHERN BAPTIST CONVENTION;  
GUIDEPOST SOLUTIONS LLC; and  
EXECUTIVE COMMITTEE OF THE  
SOUTHERN BAPTIST CONVENTION,

Defendants.

Case No. 3:23-cv-00243

Judge Richardson  
Magistrate Judge Frensley

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**UNOPPOSED MOTION FOR ENTRY OF AGREED PROTECTIVE ORDER**

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Pursuant to Fed. R. Civ. P. 26, Defendant, Guidepost Solutions, LLC, moves this Court for entry of an Agreed Protective Order, a copy of which is attached as **Exhibit 1**. This motion is unopposed.

The parties have agreed to the language and content of the proposed Agreed Protective Order and believe its entry is necessary for purposes of facilitating discovery while at the same time protecting certain information and documents that may be produced during the discovery process that the parties believe in good faith are sensitive, confidential, proprietary, and/or personal. The proposed Agreed Protective Order submitted for the Court's consideration should minimize this Court's involvement in adjudicating disputes among the parties arising from the production of such information.

Defendant, Guidepost Solutions, LLC, respectfully requests the Court enter the proposed Agreed Protective Order.

Respectfully submitted,

s/John R. Jacobson

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## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been served through the Court's electronic filing system on the following:

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on this 24<sup>th</sup> day of July, 2023.

s/John R. Jacobson